

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

<p>MICHAEL SHEPPARD,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>BAC HOME LOANS SERVICING, LP FKA COUNTRYWIDE HOME LOANS SERVICING LP, et al.,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. 3:11-cv-00062-NKM-BWC</p> <p style="text-align: center;">Judge Norman K. Moon Magistrate Judge B. Waugh Crigler</p> <p style="text-align: center;">JOINT STIPULATION CONCERNING STAY OF PROCEEDINGS AND PENDING SETTLEMENT</p>
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Plaintiff Michael Sheppard (“Plaintiff”), and Defendants Bank of America, N.A. (successor by merger to BAC Home Loans Servicing, L.P.) (“BAC”) and Federal National Mortgage Association (“Fannie Mae”) (collectively, “Defendants”), hereby jointly stipulate to continue all case deadlines for thirty (30) days. In support, the parties state as follows:

1. Plaintiff filed this lawsuit in the Circuit Court for the County of Culpeper, Commonwealth of Virginia, on August 18, 2011, and Defendants subsequently removed the case to this Court.
2. On January 24, 2011, the Court entered an Order denying Plaintiff’s Motion to Remand and dismissing defendants Mortgage Electronic Registration Systems, Inc. and Professional Foreclosure Corporation of Virginia from the case (Dkt. No. 12).
3. Plaintiff and Defendants have since reached an agreement in principle to settle the case whereby Plaintiff will dismiss all claims against Defendants with prejudice.

4. Under the Pretrial Order entered January 24, 2012 (Dkt. No. 13), parties must submit any requested changes to the Pretrial Order by Friday, February 3, 2011.

5. Under the Order entered September 29, 2011 (Dkt. No. 6), Defendants' response to the Complaint is due February 17, 2011.

6. As Plaintiff and Defendants expect to execute a formal settlement agreement soon, a stipulation staying all case deadlines would conserve the resources of this Court and the litigants.

WHEREFORE, Plaintiff and Defendants jointly stipulate that all case deadlines be stayed for thirty (30) days to allow Plaintiff and Defendants to finalize a settlement agreement.

Dated: February __, 2012

IT IS SO ORDERED.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Joseph F. Yenouskas, hereby certify that on this 1st day of February, 2012, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and a copy will be sent by U.S. mail to all non-registered parties.

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